

Recommendations Regarding the UK's Anti-Dumping Investigation on Chinese Ceramic Tableware Products

To the UK Trade Remedies Authority:

We are Hunan Xianfeng Ceramic Industry Co., Ltd., a Chinese manufacturer of daily-use ceramic products established in 1994. Our company produces approximately [confidential number] ceramic items annually and exports to over [confidential number] countries, including the United Kingdom. Among our core products are mugs and tableware, and we export millions of mugs to the UK every year. These products have been a part of British households for over a decade and are widely appreciated by consumers.

We respectfully submit our perspectives and recommendations regarding the UK's proposed anti-dumping measures on Chinese ceramic tableware products.

1. The Distinctive Structure of the UK Ceramic Industry and the Limited Impact of Chinese Products

In 2012, the European Union initiated an anti-dumping investigation into Chinese ceramic tableware products. The primary affected producers were located in continental Europe, such as Portugal. However, the structure and scale of the UK ceramic industry differ significantly from those of continental Europe.

It is evident that UK ceramic manufacturers and Chinese exporters play complementary roles in the market rather than directly competing:

Different Target Markets: Prominent UK manufacturers such as Steelite and Churchill focus predominantly on supplying the HORECA (Hotels, Restaurants, and Cafés) sector. Their products cater specifically to the hospitality industry rather than the retail sector. Conversely, Chinese exports primarily serve large UK retail chains such as Tesco, Sainsbury's, and Marks & Spencer.

Different Product Types: Chinese products, including mugs and tableware, are tailored to mid- to low-end retail consumers, offering affordable options in terms of design, price, and functionality. Meanwhile, UK manufacturers produce high-end, bespoke products aimed at the hospitality sector.

Mismatch in Production Capacity: Chinese manufacturers possess significantly larger production capacities than their UK counterparts, making direct competition in terms of price and volume impractical.

Even in the unlikely event that Chinese products were entirely withdrawn from the UK market, domestic manufacturers—constrained by cost and capacity—would find it challenging to fulfil the resulting demand. As such, the influence of Chinese products on the UK ceramic industry remains minimal.

2. Sino-UK Collaboration in Advancing Environmental Sustainability

Over the years, we have collaborated closely with UK customers, achieving significant advancements in sustainability. Together, we have made substantial investments in developing more sustainable production practices, including:

Development of Eco-Friendly Ceramics: In partnership with UK clients, we have pioneered recyclable ceramic products, significantly reducing waste.

Reduction in Carbon Emissions: Through technological innovation, we have achieved significant reductions in our carbon footprint.

Leadership in Environmental Innovation: In contrast, many UK ceramic manufacturing facilities are outdated and require substantial investments to modernise. Anti-dumping duties risk hindering the entry of eco-friendly ceramic products into the UK market, potentially undermining global sustainability objectives.

We also wish to highlight the perspectives of one of our UK customers, who stated:

“We believe customers should be encouraged to make better choices and select sustainably produced products, benefiting from such decisions. We propose that anti-dumping duties not be imposed on products containing a certain percentage of recycled materials or demonstrating a lower carbon footprint, verified using standards such as the Global Recycled Standard (GRS) or scoring systems like Dayrize. We have already demonstrated that your recycled ceramic body generates less carbon than a standard ceramic body. This approach is not only economically sound but also environmentally sustainable.”

Recommendations

In light of these considerations, we respectfully propose the following recommendations:

Eliminate Anti-Dumping Duties: The UK and Chinese ceramic industries operate in distinct market segments, and Chinese products have minimal impact on UK manufacturers. Anti-dumping duties are therefore unwarranted.

Accept Price Commitments: We are willing to commit to fair pricing for our exports to further alleviate any perceived competitive pressures on UK manufacturers.

Exempt Environmentally Certified Enterprises from Duties: We recommend duty exemptions or reductions for products or companies that meet recognised environmental certification standards, thereby encouraging sustainable practices and strengthening Sino-UK collaboration in environmental protection.

Include UK Customers in the Investigation Process: Many of our UK clients have provided constructive insights into this investigation. We suggest involving them as stakeholders to ensure a more comprehensive and balanced evaluation.

Conclusion

We firmly believe that the ceramic industries in China and the UK can thrive through mutual cooperation. Removing anti-dumping duties would uphold fair competition, encourage innovation in sustainability, and contribute to the prosperity of both markets. We look forward to continued dialogue with the UK government and industry stakeholders to deliver high-quality, sustainable products to British consumers.

Yours faithfully,

[natural person's name and position, confidential]

Hunan Xianfeng Ceramic Industry Co., Ltd.

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